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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

UNITED STATES OF AMERICA,

Plaintiff

v.

KENT T. BICKMORE, individually and
dba as Asset Protection Plus, Inc.

Defendant

Case No: 2:09-cv-00895 TC

ANSWER

COMES NOW the Defendant, Kent T. Bickmore, individually, and does hereby answer, the Complaint identified as the United States of America, Plaintiff v. Kent T. Bickmore, individually and dba as Asset Protection Plus, Inc., as follows:

1. Defendant Kent T. Bickmore admits paragraph (1) of Plaintiff's Complaint.
2. Defendant acknowledges that the Complaint in the above captioned matter is brought pursuant to I.R.C. §§ 7402 and 7408, but specifically denies each and every allegation contained as subparagraphs 2(a), 2(b), 2(c), 2(d), and 2(e).

3. Defendant has insufficient knowledge with which to respond to paragraph 3 of Plaintiff's Complaint, and therefore, denies the same.

4. Defendant admits paragraph (4) of Plaintiff's Complaint.

5. Defendant denies paragraph (5) of Plaintiff's Complaint.

6. Defendant denies paragraph (6) of Plaintiff's Complaint.

7. Defendant admits assembling the book entitled "The Poor Millionaire" but affirmatively denies that said book describes methods for hiding assets from creditors, government agencies, receivers, and courts, and affirmatively alleges that "The Poor Millionaire" simply provides information from the public Domain on methods of asset protection.

8. Defendant denies that Defendant conducted business under an assumed name as Asset Protection Plus, and affirmatively alleges that Asset Protection Plus is a separate corporation with a separate corporate existence; but further admits that Asset Protection Plus previously had an office in St. George, Utah, and Kent T. Bickmore further admits that Kent T. Bickmore and Asset Protection Plus transacted business in this district, but denies each and every allegation and inference that may be taken from the allegations contained in paragraph (8) of the Plaintiff's Complaint.

9. Defendant admits paragraph (9) of Plaintiff's Complaint.

10. Defendant denies paragraphs (10), (11), (12), (13), (14), (15), (16), and (17) of Plaintiff's Complaint, and affirmatively alleges that Defendant simply conveyed information that is generally available to the public, and only for purposes of legal and appropriate asset protection.

11. Defendant admits providing the information described in paragraph (18) of Plaintiff's Complaint, but denies any inference that may be taken from calling such information a "scheme".

12. Defendant denies paragraphs (19), (20), (21), (22), (23), and (24) of Plaintiff's Complaint.

13. Defendant admits that Asset Protection Plus had a website identified as stated in paragraph (25) of Plaintiff's Complaint, but denies each and every other inference and allegation contained therein.

14. Paragraph (26) of Plaintiff's Complaint requires no specific answer, and therefore, Defendant reasserts Defendant's answers to paragraphs (1) through (25) of Plaintiff's Complaint.

15. Defendant admits paragraph (27) and (28) of Plaintiff's Complaint.

16. Defendant denies paragraph (29) and (30) of Plaintiff's Complaint.

17. Paragraph (31) of Plaintiff's Complaint requires no specific answer, and therefore, Defendant reasserts Defendant's answers to paragraphs (1) through (30) of Plaintiff's Complaint.

18. Defendant denies paragraph (32) of Plaintiff's Complaint.

WHEREFORE, the Defendant prays for the above entitled Court to dismiss Plaintiff's Complaint in its entirety.

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DATED this 14th day of October, 2009.

/s/Clifford V. Dunn
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CERTIFICATE OF MAILING

I hereby certify that on the 14th day of October, 2009, I served a true and correct copy of the above and foregoing **ANSWER** to all those entitled to receive ECF notification in this matter and/or U.S. first-class mail, postage pre-paid, addressed as follows:

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